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HOUSING ALLOCATION PLANNING: An Annotated Bibliography

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AN ANNOTATED BIBLIOGRAPHY

by

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INTRODUCTION

The adequacy of housing, defined by Congress in 1949 as a decent home and a suitable living environment for every American family, is a concern which planners share with all Americans. The location of housing, however, is a special professional concern of planners as part of the comprehensive planning process. Planners gave expression to this concern through designation of land for residential use further categorized by varying density limitations. Until recently, however, planners stopped short of allocating housing by price and type suited to the needs of various population groupings--the elderly, young marrieds, singles, large families, occupational categories, and income brackets--to maximize their choice in area of residence. Comprehensive planning had, at best, a tenuous effect upon federal and state programs to house those unable to compete for shelter in the private market. Beginning in 1970, planners began to remedy this shortcoming by formulating housing plans designed to allocate dwelling units for particular income groups to specified locations. The newness of the technique, together with the rapidity of its spread, resulted in an information gap of unusual proportions between those engaged in allocation planning and the rest of the profession. This annotated bibliography of such plans and relevant references is designed to fill part of that gap.

Federal housing and renewal legislation, beginning with the 1949 Housing Act, made grants contingent upon comprehensive planning. However, it was not until 1968 that federal legislation required the inclusion of a housing element in comprehensive planning. Planners were now forced to cope with a component of the urban structure which, in the past, they have been content to leave to homebuilders responding to the vagaries of the market place or to the decisions of a housing authority, if one existed.

"The weaknesses of today's comprehensive planner in attempting to carry out his critical role in metropolitan housing result in large measures from long years of neglect of the housing function in comprehensive planning," observed Mary K. Nenno, Director of Program Policy and Research, National Association of Housing and Redevelopment Officials. "When the NAHRO study (see p. 15) was initiated in 1968, the research director of the American Society of Planning Officials reported that planning for housing at the metropolitan level was '...so new and so little used that it is virtually impossible to give a status report on it'." Ms. Nenno adds that their study of one state planning agency and three metropolitan regional agencies found the housing element at only an embryonic stage of development.

The widespread interest in metropolitan housing allocation planning since the field work for the NAHRO study was completed can be seen from the bibliographic references which follow. They attest to the ability of planners to adapt the tools of their profession to the planning of a new set of factors, when directed to do so. The directives came mainly from HUD during 1970-72, when most of the plans referenced herein were prepared. HUD's circulars and oral advice during this period pointed ever more insistently toward allocation plans as the proper way to satisfy the housing

element requirement. (HUD abruptly dropped this approach early in 1973 when the termination of federal housing subsidy programs largely subverted the workability of allocation plans.)

The extension of land use and density planning to housing allocation required new techniques for the quantification of housing need by dwelling unit type, size and price, the staging of construction over time and the location of units within the planning jurisdiction in relation to employment opportunities, infrastructure, vacant land, and transportation. Though the techniques had to be designed from scratch, they followed the familiar planning formula of relating the parts to the whole and to each other to meet standards of functional feasibility. The central concept of allocation had as antecedent the planners' time-honored projection of population and its accommodation within given areal jurisdictions. Its application required (1) translating population into households of specified characteristics, (2) translating residentially zoned acres into numbers of dwelling units of appropriate types and price levels, and (3) designing relevant criteria to guide their allocation to the indicated sub-areas of the overall planning jurisdiction.

The staff of the Dayton (Ohio) area's Miami Valley Regional Planning Commission was the first to move beyond studies and formulate a housing allocation plan. Its adoption by the Commission in September 1970, requiring the approval of constituents that consisted of five counties and thirty municipalities, marked a major breakthrough. This demonstration of success in selling planned allocation to suburban governments did much to encourage other regional planning agencies to try to emulate Dayton. In the space of less than three years, over twenty other planning agencies published housing allocation plans, a number of which have been adopted by their respective constituents and are being implemented.

The rapid progress of housing allocation planning was made possible by several concurrent phenomena that set the stage. The first was the metropolitan transformation during the Fifties and Sixties, which changed the traditional symbiotic relationship of central cities to their suburban peripheries into a new type of human settlement pattern, characterized by low density spread of residential, commercial, and industrial uses sustained by highway-borne, motorized transportation. This new outer city (mis-labeled suburbia) exercised a great magnetism upon the central city's middle and higher income households, and upon much of its economic base, leaving behind poverty, blight, and fiscal debility, all of them accentuated by growing minority racial concentration. The location of subsidized housing for low and moderate income families mainly in the inner city had the effect of hastening and perpetuating the socioeconomic cleavage between the central city and the new urbanization beyond its borders. The racial consequences were unmistakable. It became increasingly clear that the trend was toward central cities that would be poor, black and bankrupt, surrounded by new forms of urban settlement that would be relatively affluent, white and fiscally stable.

The thinking of those seeking to reverse this trend was logically directed toward housing a balanced proportion of low and moderate income households in the outer growth areas, including racial minorities, and infusing central city populations with more affluent households and its economic base with expanding enterprises. Such remedies had to overcome the resistance of the outer communities, whose citizens were intent upon protecting their perceived advantages against dilution expected to ensue from an influx of households of lower incomes and different ethnicity. One approach to mollifying this resistance was "sharing the burden"; each suburban municipality would accept its "fair share" of the poor--and, ostensibly, racial minorities.

The second phenomenon that facilitated the emergence of housing allocation planning was the rapid spread and increased sophistication of metropolitan regional planning in the Sixties, largely a response to the metropolitan explosion, but accelerated by federal promotion, especially the leverage given metropolitan agencies through funding and grant application review authority (A-95). Projection of population and planning for its distribution has always been an exercise that played a more prominent role in metropolitan regional planning because of its preoccupation with the rational incorporation of growth areas into the overall metropolitan fabric. Experience had, therefore, prepared and predisposed regional planners to respond to the challenge of applying planning methodology to housing unit allocation, especially since it centered largely on balance between central city and outer communities.

The third phenomenon pressing toward planned housing allocation was the nation's confrontation with its historic and unsolved problems of race and poverty during the Sixties. The Federal Government declared a "war on poverty" and adopted far-reaching civil rights laws affecting employment, education and housing. The Secretary of HUD was directed by Title VIII of the Civil Rights Act of 1968 to take affirmative action to end discrimination in housing, soon to be interpreted by federal courts as a ban upon use of federal funds to build housing where it extends or perpetuates racial concentration.

The forces that made for the emergence of housing allocation planning during the Sixties helped shape the design of its criteria and techniques. These have been in transition as each new plan sought to improve upon preceding ones. Improvement efforts have been directed mainly to these aspects: (1) from limiting allocation to subsidized housing to inclusion of the total housing supply; (2) from reliance upon largely mathematically determined "shares" to criteria that reflect metropolitan diversity in resources and opportunities; (3) from a minimally essential data base to highly sophisticated and comprehensive information; (4) from relatively short-range to long-range allocation planning; and (5) from implementation limited to promotion of subsidized housing within each community's quota to efforts to influence each community's zoning for residential growth in keeping with the allocation plan.

The transition of allocation planning from "fair share" concepts for subsidized housing to allocating all residential growth through local zoning marks a quantum leap, the implications of which have not yet been fully realized. Allocation planning within this dimension places it within the same universe of metropolitan regional planning that contains the economic base, transportation and the environment. Housing allocation limited to subsidized units cannot be properly related to these other basic regional components. The allocation of the total projected housing need is especially relevant to environmental planning. It provides a basis for overcoming the juxtaposition of housing needs against environmental concerns, by permitting the allocation of needed housing units in a manner that is most compatible with environmental considerations. Such a relationship between housing and environment at the metropolitan regional scale can produce the only ecological criteria acceptable on the basis of human needs.

The literature of housing allocation planning referenced in the pages which follow represent a first generation effort, telescoped into an incredibly brief three years of experience. The first tentative theoretical formulations are already in the process of being revised and strengthened on the basis of growing experience. Much more needs to be done in allocation planning theory. This, in turn, is dependent upon broadening and deepening allocation practice to feed back new findings and new insights.

The bibliography benefited from John P. Prior's conscientious pursuit of fugitive documents and his competent analysis of contents. The authors are indebted to the many staff planners throughout the United States who responded to our requests for information on this new area of planning.

The National Committee Against Discrimination in Housing sponsored this project as a contribution to greater understanding of housing allocation theory and practice. NCDH sees housing allocation at the metropolitan regional scale as a major step toward realizing freedom of choice in residence, without regard to race or income.

Ernest Erber, AIP

I. ALLOCATION PLANS

Cleveland, Ohio

Cleveland City Planning Commission. Housing Summary and Recommended Policy Statement, Cleveland, June 1970.

Although the Commission's jurisdiction is limited to Cleveland's municipal boundaries, this statement reveals an awareness of the metropolitan scope of housing programs by proposing that Cleveland's suburbs join it in meeting the county-wide need for public housing. It recommends that all suburbs accept allocations equaling 2% of their 1960 households.

Dayton (Ohio) Area

Miami Valley Regional Planning Commission. A Housing Plan for the Miami Valley Region, Dayton, July 1970.

This, the first allocation plan approved for implementation, is designed to meet subsidized housing needs for each of the five counties in its area. It formulates five-year construction goals for each municipality within its jurisdiction. After dividing the counties into analysis sectors, their size reflecting respective degrees of urbanization, the planners calculated each district's "share" of the county-wide goals based on a formula that includes criteria for equal shares, proportionate shares of households eligible for subsidized housing, poverty, local educational funding capacity, and over-crowded schools. The final allocation reflected the average of the findings for each criterion.

Middlesex County (New Jersey) Area

Middlesex County Planning Board. Interim Master Plan, New Brunswick, September 1970.

The housing element of this master plan probably represents the most thorough housing allocation plan yet adopted. It allocates by income range and age group the total number of housing units of all types needed by 1975 throughout the county, thus going beyond the "fair share" concept which is limited to subsidized units. Two studies by the consulting firm of Hammer, Greene, and Siler, (Population, Housing and Income, June 1969 and Housing and Economic Evaluation, May 1970) provide the data base for the distribution plan. They project and analyze housing demand over a thirty-year period as generated by changes in age, employment, household, income, and population characteristics, within four sectors into which the county has been subdivided. Selection of specific sites within each sector is to be in conformance with the county's long-range land use, water and sewer, highway, open space, recreational facilities, and transit plans.

Miami (Florida) Area

Dade County Planning Department. Housing in the Metropolitan Plan, Miami, September 1970.

This two-year plan locates potential sites for a housing rehabilitation and construction program by rating developable acreage according to accessibility to services and its potential for reducing metropolitan economic and racial segregation. Short-term projections of population and economic growth are the basis for the plan.

Dayton, Ohio

Dayton City Planning Board. Housing Opportunities: Policies for the Dispersal of Low and Moderate Income Housing, Dayton, December 1970.

Basically, this is an adaptation of the Miami Valley formula (above) to implement achievement of the city's share of the regional plan. In choosing available sites, it also gives priority to planning areas where the ratio of public housing units to total housing units is below that for the city.

San Francisco, California

San Francisco Department of City Planning. The Comprehensive Plan - Residence, San Francisco, April 1971.

As in the above Dayton City plan, the San Francisco plan seeks to reduce the variance between the percentage of publicly subsidized units in the city's housing inventory and the ratio of such units within each planning district.

Rochester (New York) Area

Genesee - Finger Lakes Regional Planning Board. Housing: Regional Analysis and Program, Rochester, June 1971.

The county allocations contained in this plan are the result of an exhaustive study documenting the effect of construction costs, building codes, subdivision requirements, land supply, and zoning restrictions upon the cost, type and supply of housing in the seven county Rochester area. The volume measures the amount of low and moderate income units needed in each county by 1975 as the basis for allocating the numbers, types, and price ranges of additional construction needed to provide optimum vacancy rates. Allocations for individual towns will be released in a forthcoming report.

Washington (D.C.) Area

Metropolitan Washington Council of Governments. Fair Share Housing Formula, Washington, January 1972.

This plan uses a variation of the Dayton approach in attempting to overcome the shortage of low cost housing revealed by the 1970 census data on income. The District of Columbia, surrounding county governments, and incorporated suburbs receive allocations which reflect the percentage of the area-wide subsidized housing need required in each jurisdiction. The ratios are allocated by averaging the percentages calculated by four individual distribution factors. The criteria are the existing housing need by such jurisdiction's population and of its non-resident work-force, its availability of developable land, and its per capita fiscal resources. Unlike the Rochester plan, it does not project future subsidized housing needs created by population growth.

San Bernadino (California) County

San Bernadino County Planning Department. Government Subsidized Distribution Model for Valley Portion, San Bernadino County, San Bernadino, January 1972.

This plan, limited to the county's urbanized area, averages separate factors to make its final allocations as in the Miami Valley and Washington models. Besides allocating units throughout the target area, this plan innovates regulatory measures to prevent the concentration of subsidized housing units within planning areas. The scheme limits subsidized projects to 75 units for multi-family and 40 units for single family.

The allocation model contains a formula for yearly allocations to individual planning districts which averages seven factors: the ratio of the region's population, housing need, jobs, school capacity, wealth, and land cost in each planning area. After the completion of district allocations, a mini-model is used to evaluate proposed construction sites within each district. Each proposal is graded by a point system measuring the availability of mass transportation, employment centers and undeveloped land, as well as the suggested project's impact upon the concentration of subsidized housing projects and school enrollments.

Los Angeles (California) Area

Los Angeles County Regional Planning Commission.
Preliminary Housing Element, Los Angeles, April 1972.

Similar to the Rochester and Middlesex plans in its analysis of area-wide growth trends, this plan allocates additional subsidized housing to outlying sectors, exempting the urban core, because it is expected to sustain little, if any, additional growth. HUD's site selection criteria is used as an index for locating suburban construction sites.

Pueblo (Colorado) Area

Pueblo Area Council of Governments. Pueblo Housing Element, Pueblo, June 1972.

Although this plan is the result of a study projecting the number of housing units at each price range needed in the county by 1975, the allocations are limited to public housing units and to the city of Pueblo which occupies nearly all of the county's urbanized land. The plan uses the Miami Valley approach of calculating the average of separate distribution elements in allocating quotas to each of the four areas into which the city has been divided. In this case, the indicators used are even share, number of dwelling units, number of low and moderate income families, existing subsidized housing, income, and minority school enrollments. HUD's site selection criteria is used to evaluate the proposed project locations in each area.

Martinsville (Virginia) Area

West Piedmont District Planning Commission. Preliminary Housing Plan, Martinsville, June 1972.

It utilizes the same comprehensive methodology as in Middlesex County's allocation plan. The twenty-year plan assigns the number of low, moderate, and market-rate dwelling units needed in each decade within each political jurisdiction. The housing element contains an ongoing four-year program for choosing the necessary sites in compliance with the region's comprehensive land use, sewer, open space, and transportation plans.

Milwaukee (Wisconsin) Area

Southeastern Wisconsin Regional Planning Commission.
A Short Range Action Program for Southeastern Wisconsin,
 Waukesha, June 1972.

This two-year study for the seven Wisconsin counties in the Chicago-Milwaukee urban corridor was made at the request of HUD. After calculating short-term subsidized housing goals, the planners made allocations to twenty-five planning districts on the basis of a seven factor model which calculated each district's proportionate share of the 1800 units needed to meet the regional goal of 2,000. Unlike the Dayton, San Bernadino, and Washington models, which make allocations by averaging factors, this plan weights each indicator by its relative importance. Thus, the housing need accounts for 60% of the units allocated to each sector, fiscal factors 15%, growth indicators 10%, and developable land indicators 5%.

San Jose (California) Area

Planning Policy Committee of Santa Clara County. Site Selection Standards for Assisted Housing, San Jose, 1972.

In preparing its housing allocation plan, the county planning committee produced this manual which uses HUD's site selection criteria to locate areas suitable for subsidized housing projects.

Planning Policy Committee of Santa Clara County. Production Objectives for Assisted Housing, San Jose, August 1972.

Though this plan follows the Miami Valley, Washington area, and San Bernadino models in averaging factors, it replaces existing housing need as a factor with indicators of each municipality's growth rate and minority population in its six-factor allocation formula.

Sacramento (California) Area

Sacramento Regional Area Planning Commission. An Approach to the Distribution of Low and Moderate Income Housing, Sacramento, August 1972.

This plan uses three separate formulas for allocating units to the rural, metropolitan fringe, and urban areas of six counties. Essentially, the urban area formula used in distributing the units is a simplified version of the San Bernadino model, omitting the factors of overcrowding in schools and available land. The more simplified rural area formula eliminates local fiscal capabilities as a factor. Both formulas produced the same allocations for the metropolitan fringe area. Like the San Bernadino plan, the Sacramento model contains a grading system for evaluating potential sites for subsidized housing. Except for weaker safeguards against overconcentration, Sacramento's ranking system is essentially the same as San Bernadino's.

Rochester (New York) Area

Monroe County Planning Council. Housing: A Challenge for Monroe County, Rochester, November 1972.

In allocating local goals for achieving the projected five-year county-wide housing need, this plan uses Miami Valley's six-factor formula in allocating units to planning sectors and then in distributing them to municipalities within each sector. However, it deviates from the model in that the boundaries of its sectors are not coterminous with municipal boundaries resulting in allocations to the municipalities in the form of ranges instead of a specific number of units.

Denver (Colorado) Area

Denver Regional Council of Governments. A Regional Housing Plan: Policies and Their Implementation, Denver, December 1972.

Similar to, though not as comprehensive as the Middlesex County plan, the Denver regional plan allocates family and elderly units to planning areas, according to projected patterns of regional development. A detailed analysis of each district's population increase, employment growth, standard of living, and supply of developable land provides the data for the distribution scheme.

Ventura County (California)

Ventura County Planning Department. Housing Distribution Model, Ventura, December 1972.

Essentially similar to the Miami Valley model for allocation procedure, it follows the San Bernadino plan in limiting itself to the subsidized housing need in the urbanized part of the county. It makes allocations to eight housing submarkets with a formula averaging each district's population, housing need, low and moderate income population, employment base, and growth rate. HUD site selection criteria is used to evaluate potential project locations within each area.

Philadelphia (Pennsylvania) Area

Delaware Valley Regional Planning Commission. Fact Sheet: Housing Allocation Plan, Philadelphia, March 1973.

Like the Dade County and Middlesex County plans, it is based on long-range projections. Covering the four central cities and eight suburban counties in the Philadelphia and Trenton SMSAs, the report projects the number of additional dwelling units needed for all income ranges within each county and central city to the year 2,000. The estimates are based upon employment projections for each income group, the fiscal capacities of each county, and the income distribution within each county. The Regional Planning Commission will soon issue a detailed report.

Dayton (Ohio) Area

Miami Valley Regional Planning Commission. The Miami Valley Region's Housing Plan, Dayton, March 1973.

In updating its 1970 housing allocation plan, the planning commission adheres to its original approach of assigning quotas by averaging factors. Utilizing the results of the 1970 census, the plan incorporates additional criteria in compiling the factor that reflects housing need. It also adds developable land as a criteria for the indicator showing each municipality's relative ability to absorb additional low and moderate income units and considers each municipality's performance in achieving its 1970 allocation.

Jacksonville, Florida

Jacksonville Community Renewal Program. A Housing Distribution Model for Jacksonville, Florida, Working Paper #13, Jacksonville, April 1973.

This eight-year plan for allocating units to planning sectors follows the Southeast Wisconsin technique of assigning relative importance to individual distribution criteria. A sector's lack of low income and minority households is a factor that accounts for half of the units distributed. After averaging factors of accessibility to jobs available to low income wage earners, community facilities, schools, and stores, final allocations are made by balancing each sector's development potential with its potential for absorbing low income and minority population.

Baltimore (Maryland) Area

Baltimore Area Housing Advisory Council. A Housing Plan for the Baltimore Region, Baltimore, May 1973.

This plan establishes ten-year low and moderate income housing goals for Baltimore and its five adjacent counties. An analysis of current housing needs, developable land, regional population growth and economic development provided the allocation criteria. Like the Los Angeles county plan, which assigns rehabilitation and construction goals, the scheme states that no new subsidized construction should be assigned to the central city.

St. Louis (Missouri) Area

East-West Gateway Coordinating Council. Final Draft: Regional Housing Plan for St. Louis Metropolitan Area, St. Louis, May 1973.

It documents the existing need for low and moderate housing in each planning district. Having stated localized need, it stops short of allocations and asserts that all communities within the seven-county region should share responsibility for meeting the area-wide need for subsidized housing.

Minneapolis/St. Paul (Minnesota) Area

Metropolitan Council of the Twin Cities Area. Housing: Plan, Policy, Program, Minneapolis, June 1973.

Reflecting, rather than anticipating, growth in the seven-county Minneapolis area, through bi-annual revisions is the goal of this two-year plan. In allocating the size and number of dwelling units, it ranks planning areas according to the degree of urbanization needed in the central cities, urbanized and less developed suburbs and rural areas. The municipalities within each grouping represent the four growth sectors which receive allocations based on their present and projected rate of development. The number of units assigned to each sector is in direct proportion to their 1970 and projected 1980 population and employment. No specific allocations are made to the municipalities within each sector.

Cleveland (Ohio) Area

Cuyahoga Metropolitan Housing Authority. Study Reflecting Need in Cuyahoga County for Public Housing and Proposed Production Plan, Cleveland, June 1973.

After a federal district court ruled that each Cuyahoga County suburb should authorize the county housing authority to provide public housing for their resident low income households and for each Cleveland resident likely to want to live in that community, the court ordered this study to determine the need for public housing in each suburban community. Using detailed census data, and public housing eligibility criteria, the study documents the number of eligible residents in each municipality. A 1970 Cleveland City Planning Commission survey on residential preferences provided projections for the number of Cleveland households desiring to move to the suburban public housing. The combined need was calculated and allocated to municipalities with reference to their percentages of residents eligible for public housing.

Springdale (Arkansas) Area

Northwest Arkansas Regional Planning Commission. 1973
Housing Element, Springdale, June 1973.

It makes a thirty-year projection of the additional number of units needed for each income bracket. Allocations based on population and income characteristics of each town are made in five-year intervals for a thirty-year period.

Chicago (Illinois) Area

Regional Housing Coalition. An Interim Plan for Balanced Distribution of Housing Opportunities for Northeast Illinois, Chicago, October 1973.

A coalition of Northeastern Illinois Planning Commission representatives, public officials, businessmen, and citizen groups devised this ten-year plan for the six counties of the Chicago area.

The city of Chicago, five sectors of surrounding Cook County and each outlying county receive allocations determined by current need for subsidized housing with quotas for units for the elderly, and anticipated population growth. Projected increases are compared with current trends to calculate the number of units needed to stabilize a 4% vacancy rate.

Toledo, Ohio Area

Toledo Regional Housing Coalition and Toledo Metropolitan Council of Governments. A "Fair Share" Housing Allocation Plan for the Toledo Metropolitan Area, Toledo, 1973.

After projecting the total number of additional dwelling units needed in each planning area, the plan assigns the percentages of the new units required by low and moderate income households. The initial percentage allocations reflected the 1970 census data on household income. The ratios were then revised to compensate for the varying amounts of substandard units, projected employment increases, assessed pupil valuations, and population densities in each planning area.

Each factor accounted for percentages ranging from one to four percent, which were to be added or deducted from each sector's original allocation. The ratios' reflecting substandard housing was then doubled and the population density index halved. The final allocations, representing the sum of the initial allocation and the five adjustment criteria, were expressed in the percentages, number of low and moderate income units, and ranges of additional elderly units needed in each planning area.

II. METHODOLOGIES USEFUL IN HOUSING ALLOCATION

Hammer, Greene, Siler Associates. The Housing Element for State, Regional and Local Planning Agencies, (2 vols), Washington, D.C.: Hammer, Greene, Siler Associates, June 1971.

This probably the most inclusive guide to sources and techniques for preparing the housing element of a comprehensive plan. Although not limited to metropolitan area planning, this is clearly its major thrust. Volume I, which explains the operation of housing markets, including production, delivery systems, building codes, filtering, and governmental intervention, offers a technique for developing a housing element. Volume II describes sources and methods of analyzing the statistical data necessary to complete the housing element. Though these volumes do not provide a "how to" recipe for such an undertaking, they are extremely useful tools for preparing housing allocation plans. Hammer, Greene, Siler Associates prepared the documents as consultants to the American Institute of Planners, under contract to HUD.

James, Franklin J. and James W. Hughes. Economic Growth and Residential Patterns: A Methodological Investigation, New Brunswick: Center for Urban Policy Research, 1972.

The authors develop a statewide economic growth model which could anticipate local housing needs by allocating a state's industrial growth to small areas. In a case study of New Jersey's pharmaceutical industry, the study uses data on nation-wide economic trends and the industrial location patterns to suggest the numbers and income ranges of additional employees each New Jersey county would receive as a result of the industry's state-wide growth. The methodology projects the numbers, types, and costs of housing needed to accommodate the increased work force. A second volume, even more closely related to devising allocation plans, is in progress.

Nenno, Mary K. Housing in Metropolitan Areas: Roles and Responsibilities of Five Key Factors, Washington, D.C.: National Association of Housing and Redevelopment Officials, 1973.

A HUD-funded study of the relationship of comprehensive planning, community development, and housing production at the metropolitan level. Concluded that, despite strong rationale for interrelationship in theory, practice was rudimentary in four areas studied during 1968-71.

Smith, Wallace F. Housing Market Data from Census Materials:
A Study of the Bay Area, Berkeley: University of California
Institute of Business and Economic Research, 1963.

This case study uses census data to reveal the changes which occurred in the San Francisco-Oakland SMSA during the 1960's. It uses published and unpublished tabulations to analyze regional changes in income, occupation, family formation rates, journey to work patterns, housing inventories, and migration patterns. The study illustrates uses of census data in projecting regional housing needs.

United States Department of Housing and Urban Development. Federal Housing Administration. Economic and Market Analysis Division. FHA Techniques in Housing Market Analysis, rev. ed., Washington, D.C.: U. S. Government Printing Office, 1970.

This study describes FHA's methods of housing market analysis. Designed as a training manual and reference book for FHA analysts, it suggests ways of evaluating the development potential of regional housing markets. Although it does not attempt to link housing to the comprehensive planning process, the study is helpful to planners in calculating short-term market demand as defined by FHA for dwelling units by various income groups.

University of Pennsylvania Institute of Public Policy Analysis. Standards for Housing in Suburban Communities Based Upon Zoning for Work, Philadelphia: Fels Center of Government, 1971.

Using five townships in Bucks County, Pennsylvania as examples, this monograph offers a statistical technique for anticipating residential demand according to a town's existing zoning pattern. Although it does not project the economic growth which will probably alter such existing zoning patterns, it does provide a detailed technique for evaluating the residential demand generated by a small area's present and potential work force.

University of Pennsylvania Institute of Public Policy Analysis. Standards for Suburban Housing Mix: Bucks County, Pennsylvania, Philadelphia: Fels Center of Government, 1972.

It explores possible housing mix standards (by income, type, and density) by evaluating local school and sewerage facilities, employment, age, and income taxes. Using 1960 and 1970 census data for the study area and the larger SMSA, it compares metropolitan and county changes in population, income, employment, and housing inventory. The comparative analysis of local and regional changes offer helpful suggestions for making allocations to small areas.

III. COMMENTARIES AND CRITIQUES

Bertsch, Dale F. and Ann N. Shafor. "A Regional Housing Plan. The Miami Valley Regional Planning Commission Experience," Planner Notebook, I, April 1971.

This case study focuses on the regional planning commission's efforts to gain the support of local officials, planning agencies, builders and citizen groups for a housing allocation plan for subsidized units. It describes the roles of all actors in the planning process from the formulation to the implementation of the distribution scheme.

Brooks, Mary E. Low Income Housing: The Planners Response, Chicago: American Society of Planning Officials, 1972.

It surveys various strategies employed by local, state and regional agencies to formulate subsidized housing proposals. The report gives a rationale for metropolitan, area-wide housing remedies. It analyzes allocation plans adopted in the Dayton, Minneapolis, San Bernadino, and Washington areas. It gives examples of local zoning practices conducive to increasing housing stock for low and moderate income families such as zoning density bonuses, and requirements that large multi-family projects contain a ratio of subsidized units.

Holmgren, Edward L. and Ernest Erber. "Fair Share Formulas," HUD Challenge, IV, April 1973, pp. 22-25.

This article traces the evolution of housing allocation planning and its growing support among planners and civil rights advocates. Using the Dayton, Minneapolis, San Bernadino and Washington plans as examples, it evaluates these early "fair share" formulas as strategies for reversing the mal-distribution of regional housing opportunities.

Metropolitan Washington Housing and Planning Association. Housing Needs of Montgomery County's Projected 90,000 New Workers, Rockville, Maryland: Montgomery County Department of Community and Economic Development, 1972.

This study used employee interviews to document the housing demand generated by the economic development of a suburban Washington industrial corridor. Its findings are compared with the area's housing inventory.

National Committee Against Discrimination in Housing. Jobs and Housing: A Study of Employment and Housing Opportunities for Racial Minorities in Suburban Areas of the New York Metropolitan Region, New York: 1970.

The report is the result of a comprehensive two-year study of the social and economic implications of the movement of jobs to over-whelmingly white suburbs and the continuing containment of unemployed and underemployed minority workers in central cities. It is based on field interviews and community surveys in five suburban counties of New York City.

National Committee Against Discrimination in Housing. Trends in Housing, XVL (No. 2-3), 1972.

These two issues summarize housing allocation plans in the Dayton, Minneapolis, San Bernadino and Washington areas.

Rahenkamp, John. "Every Suburb Can Absorb a Share of the Low Cost Housing," House and Home Magazine, 40, May 1972, pp. 60-62.

Using the Philadelphia area as an example, the article argues for a "trickle down" approach to allocation planning. It contends that allocation of middle income units in cluster developments to communities with vacant land in varying amounts could induce a chain of movements to improved housing for those of less income.

Southern California Association of Governments. A Technical Study of Housing Allocation Models, Los Angeles: Southern California Association of Governments, May 1973.

This concise report is an excellent analysis of allocation planning. It contains a synopsis of the goal determination, plan formulation, and strategy of implementation used by allocation planners in Dayton, Minneapolis, Southeast Wisconsin, Denver and several areas in California.

Southern California Association of Governments. An Elected Official's Guide to Selected Housing Allocation Models, Los Angeles: Southern California Association of Governments, May 1973.

Summarizes SCAG's detailed analysis of allocation plans as a source of information for elected officials, administrators, and the public.

IV. LEGAL OPINIONS RELEVANT TO ALLOCATION

Daley v. City of Lawton, Oklahoma, 425 F. 2d 1037 (10th Cir. 1970); and Kennedy Park Homes Association, Inc. v. City of Lackawanna, New York, 318 F. Supp. 669 (W.D. N.Y. aff'd., 436 F. 2d 108 (2nd Cir. 1970) cert. denied, 401 U.S. 1010 (1971).

The courts held that neither the inadequacy of public facilities nor fiscal burdens added by residential growth constitutes an adequate reason for denial of rezoning or issuance of building permits for subsidized housing, provided that it is within the reasonable means of the municipality to finance them.

Southern Alameda Spanish-Speaking Organization (SASSO) v. City of Union City, California, 424 F. 2d 291 (9th Cir. 1970).

In response to a complaint that Union City's zoning deprived its low income citizens of subsidized housing, the court ordered "that the City take steps necessary and reasonably feasible under the law to accommodate within a reasonable time the needs of low income residents of Union City."

Southern Burlington County NAACP v. Township of Mt. Laurel, 119 N.J. Super 164 (Superior Ct., 1972).

The court ordered the town to amend its zoning ordinance to provide housing opportunities for present and potential low and moderate income residents, including an appropriate proportion of those now living in more densely populated parts of the area. This case is also significant for challenging an entire zoning ordinance as being exclusionary without reference to a particular property as a proposed building site.

Brookhaven Housing Coalition v. Kunzig, 341 F. Supp. 1026, _____ F. Supp. _____ (E.D. N.Y. 1972), notice of appeal filed September 15, 1972.

In the Brookhaven case, a federal district court ruled that the federal government was required to take affirmative action to assure equal housing opportunities to all present and prospective employees of a federal installation (an Internal Revenue Service office with some 4,000 employees) being moved to a new location. The case is now on appeal.

The decision suggests that the courts will use broad interpretations of the 14th Amendment to guarantee equal protection of the law to low income government employees whose jobs depend on accessible housing as incorporated into many allocation plans. The same principle is involved in the Mahaley case (see below) in the context of the housing opportunities of workers, whether in public or private employ, dependent upon public housing for a decent environment.

Shannon v. HUD, 436 F. 2d 809 (3rd Cir. 1970); Banks v. Perk, 341 F. Supp. 1175 (N.D. Ohio, 1972); and Gautreaux v. Chicago Housing Authority, 296 F. Supp. 907, 304 F. Supp. 736 (N.D. Ill. 1967), aff'd as to program of relief, 436 F. 2d 306 (7th Cir. 1970) cert. denied, 402 U.S. 992 (1971).

In these cases, dealing with site selection of a HUD 236 project in Philadelphia, and site selection policies of public housing authorities in Cleveland and Chicago, federal courts ruled that Title VIII of the 1968 Civil Rights act prohibited the use of federal funds for housing which increased or perpetuated racial concentration. All three cases placed upon federal and local governments the obligation to work affirmatively for broadening choice of residential area for racial minorities. As a result of the Shannon decision, HUD established site selection criteria in 1972 which rated project proposals by their potential for reducing racial concentrations. These criteria have been incorporated into a number of metropolitan housing allocation plans. Noting the similarities between the Banks case and a pending Cleveland metropolitan-wide public housing case, the court consolidated them for pre-trial hearings, thus allowing the metropolitan implications of Banks to be explored.

Crow v. Brown, 332 F. Supp. 382 (N.D. Ga. 1971) aff'd per curiam, 457 F. 2d 788 (5th Cir. 1972).

As the minority population of many large cities approaches 50%, the courts are becoming more inclined to propose metropolitan remedies, instead of the site location remedies within cities as in Shannon and Gautreaux. In the Crow case, which arose after two white suburbs of Atlanta refused building permits for public housing projects, the court ruled that racial discrimination had motivated the refusal. Finding the Atlanta Housing Authority guilty of using site selection policies which perpetuated racial segregation, the court did not restrict the remedy to proposed projects but ordered the construction of additional units in the suburbs. This case is of the new generation of federal court remedies in both housing and school complaints that go beyond the boundaries of the offending jurisdiction.

Mahaley v. CMHA, 342 F. Supp. 250 (N.D. Ohio 1972).

This case extends the principles enunciated by Lackawanna (that inadequacy of sewers is no reason for exclusion), Gautreaux (against racial concentration) and SASSO (zoning must include housing opportunities for the poor) to a metropolitan level as in Crow. The issue arose when the Cuyahoga Metropolitan Housing Authority (CMHA), authorized by law to construct public housing throughout the county with consent of local government, failed to get it from Cleveland's suburbs. The court's decision found that five defendant suburbs had used the consent requirement as a tool to perpetuate metropolitan racial segregation.

Citing the Banks case as a temporary solution, the court stated that "CMHA, the City of Cleveland, and the municipalities within Cuyahoga County must act together if segregation in racial housing patterns is to be once and forever eliminated." The court ordered CMHA to prepare and implement a plan that sets forth the number of family and elderly public housing units needed in each suburb for its own residents as well as any public housing residents from Cleveland likely to move there. When approved by the court, it will constitute the first court-ordered allocation plan, possibly the forerunner in a widely used resort to judicial remedies in equalizing housing opportunities between central city and suburbs.

Oakwood at Madison v. Tp. of Madison, 117, N.J., Super. 11 (Superior Ct. 1971).

The court, in striking down the zoning ordinance of Madison Township as exclusionary, stated in broad language that "a municipality must not ignore the housing needs, that is, its fair proportion of its own population and of the region." The Madison opinion suggests possible legal enforcement of housing allocation plans based on the principle that they provide both equal protection and realization of the objectives of zoning as defined by state enabling legislation, in that they project changes in economic, household, income, and population characteristics of the region (e.g., housing allocation plans for Middlesex County, Rochester, Delaware Valley). Madison, together with Mount Laurel, is now before the New Jersey Supreme Court.

V. LEGISLATION AND REGULATIONS RELEVANT TO ALLOCATION

1968 Civil Rights Act, Title VIII.

Known as the federal fair housing law, the act prohibits discrimination based on race, color, religion, or national origin in the sale, rental, financing, or advertising of dwelling units, including vacant land to be used for residential purposes. It directs the Secretary of HUD and "all executive departments and agencies" to administer their programs and activities relating to housing and urban development in a manner affirmatively to further the policies set forth by the fair housing law. It also directs that all such departments and agencies shall cooperate with the Secretary of HUD to that end. Federal courts have interpreted this to mean that it is illegal to use federal funds or authority in a manner that enhances or sustains racial concentration.

Demonstration Cities and Metropolitan Development Act (1966).

This act initiated the metropolitan notification and project review system. Sec. 204 requires areawide planning organizations to review applications for federal funding under specified public facility grant programs, evaluate their relationship to metropolitan comprehensive planning, and append their findings to such applications.

Title IV, Intergovernmental Cooperation Act of 1968.

This act expanded the review system to include all categorical grant programs, including housing. It ordered the President to establish rules and regulations for federal review of applications for assistance funds to state and local programs having a significant impact on area and community development.

Office of Management and Budget. Circular A-95. (October 1, 1969).

Implemented Title IV of the Intergovernmental Cooperation Act by extending the project notification and review system to include broader participation in the formulation of local applications, review of projects in states and non-metropolitan areas, and planning assistance programs. Revised on April 1, 1971, to add human resources programs and large housing developments--subdivisions of over 50 single family homes, multi-family and mobile home projects of over 100 units, and college housing projects of over 200 units. Revised on March 8, 1972, to explicitly include civil rights concerns in the review process and authorize civil rights enforcement agencies to participate in the notification and review process.

Executive Order 11512 (February 27, 1970).

The Presidential order requires that low and moderate income housing opportunities be a selection factor in determining the location of federal installations.

United States Department of Labor. Office of Federal Contract Compliance. Revised Order 4. (February 5, 1970).

This Labor Department order requires a company with a federal contract operating in a community whose housing policies prevent the company from meeting its equal employment goals to take special corrective action which would promote housing opportunities congenial to successful recruitment of qualified minorities. Such action could entail relocation to another community or working on contract at branch facilities in communities with acceptable housing patterns.

HUD Site Selection Criteria (February 1972).

Initiated a grading system for evaluating proposed federally subsidized housing projects according to housing and community development criteria. The standards grade each proposed site's potential for meeting the area housing need, avoiding minority residential concentrations, improving minority employment opportunities, and contributing to orderly growth and conservation of natural resources. The criteria have been used as guidelines for numerous housing allocation plans.

HUD Affirmative Fair Housing Marketing (February 25, 1972).

This regulation requires filing of plans by builders and other users of FHA housing programs (including those not subsidized) that specify how such financed units will be marketed to assure "a like range of housing choices" to all eligible residents of the housing market area "regardless of their race, color, religion, or national origin." The plan becomes part of the contractual obligation of the applicant for FHA funding and requires faithful execution in advertising units for sale or rent and soliciting buyers or renters.

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